

November 27, 2018

Via SCPSC E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: Application of Duke Energy Progress, LLC for Adjustments in Electric Rate
Schedules and Tariffs and Request for an Accounting Order;
Docket No. 2018-318-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By

Stephanie U. Eaton (SC Bar No. 80073)
Carrie M. Harris

Derrick Price Williamson
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Counsel to Walmart Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-318-E

IN RE: Application of Duke Energy Progress,)	PETITION TO INTERVENE OF
LLC for Adjustments in Electric Rate)	WALMART INC.
Schedules and Tariffs and Request for an)	
Accounting Order)	

Pursuant to Rule 103-825 and other applicable rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On November 8, 2018, Duke Energy Progress, LLC ("DEP" or "Company"), filed an Application for adjustments in electric rate schedules and tariffs and request for an accounting order ("Application"). The Application was filed pursuant to S.C. Code Ann. §§ 58-27-820 and 58-27-870, and S.C. Code Ann. Regs. 103-303 and 103-823, the Rules of Practice and Procedure of the Public Service Commission of South Carolina. The Application requests an increase of approximately \$59 million (or 10.3 percent) in its retail revenues to be effective June 1, 2019. The Company's Application also requests Commission approval of additional rate changes and other proposals.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10th Street, Bentonville, AR 72716-0550.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of DEP. Walmart has 12 retail stores and related facilities in South Carolina that are served by DEP. Walmart purchases approximately 41 million kWh annually from DEP. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to DEP's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina.

4. Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from the Company pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

5. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Harris be added to the service list as Walmart may seek Mr. Williamson's and/or Ms. Harris' admission to appear before the Commission *pro hac vice* in the near future.

5. This Petition to Intervene is timely filed as interventions are due by December 27, 2018, per Notice of the Commission.

WHEREFORE, Walmart Inc., respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

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Counsel to Walmart Inc.

Dated: November 27, 2018

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-318-E

IN RE: Application of Duke Energy Progress,)	CERTIFICATE OF SERVICE
LLC for Adjustments in Electric Rate)	
Schedules and Tariffs and Request for an)	
Accounting Order)	

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Dated: November 27, 2018